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**Date:** 06/04/2016  
**Our ref:** 2016/0179/PRE  
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[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Dear Ms Sameera Swatiwal

**Re: Extension and division of property into 7 self-contained residential units – 80 Greencroft Gardens, NW6 3JQ**

Thank you for submitting a pre-planning application enquiry which was received on 20<sup>th</sup> of January 2016 together with the required fee of £3,600.

The applicant wishes to receive the Council's view on the proposed extension and sub-division of the above site for create 7 residential units within the property. As a result of a pre-app meeting with officers on the 18<sup>th</sup> of February, the initial options were discussed and finalised into one single proposal for the site. This final revision will be that which is now assessed.

## 1. Drawings and documents

1.1 The following documentation was submitted in support of the pre-application request:

- Pre-Planning Proposal statement (revised)
- Proposed drawing set (Rev E)

## 2. Proposal

2.1 Division of property into 7 residential units at 80 Greencroft Gardens, NW6 3JQ.

2.2 The existing building is already divided into 4 units. A breakdown of the existing and proposed unit mixed is outlined below:

Existing:

- Ground floor: 1x 3bed, 5 person unit
- First Floor: 2x 1bed, 2 person units
- Second Floor: 1 x 3bed, 6 person unit

Proposed:

- Basement / Ground floor: 2x 3bed, 6 person duplex units
- First Floor: 1x 1bed, 2 person unit; 1x 2 bed, 3 person unit
- Second Floor: 1x 1bed, 2 person unit; 1x 2 bed, 3 person unit
- Loft: 1x 3 bed, 5 person unit

2.1. In order to facilitate this sub-division the following external alterations are proposed to the existing property:

- An extension to the existing basement level to increase its extent to the full footprint of the existing property plus approximately 2m beyond the proposed rear building line at ground floor level as well as two front light wells. A 'sunken garden' with a depth of 2.5m beyond the proposed ground floor rear building line is also proposed providing access the rear garden from lower ground floor level.
- A single storey full width rear extension at ground floor level which would project approximately 5m beyond the original rear elevation.
- Rear terraces with glass balustrading at ground, first and loft levels (with the loft terrace being inset into the roof).
- Two rear dormer windows as well as 6x skylights to the roof.
- The enlargement of 2x ground floor windows at ground floor level.

### 3. Site description

- 3.1 The application site comprises a three-storey detached building located on the North side of Greencroft Gardens. Properties along the street including the application site feature regular plots and generous rear gardens. The application property is situated within the South Hampstead Conservation Area and is described as a Positive Contributor in the South Hampstead Conservation Area Character Appraisal and Management Strategy (2011).
- 3.2 Greencroft Gardens features a number of the most ornate and attractive examples of late 19<sup>th</sup> century architecture within the Conservation Area. The street is characterised by three storey, detached mansions with strong uniformity in design. Many of these properties have since been altered and converted into flats however the area's unique character has been preserved.
- 3.3 The site is highly accessible by public transport, with a PTAL Rating of 6a. The application site is not located within the vicinity of any Listed Buildings or protected trees.
- 3.4 The Council's registers identify the application site as featuring hydrological constraints, slope stability constraints as well as being with the Goldhurst Local Flood Risk Zone (underground constraints and surface flow issues).

### 4. Relevant planning history

- 2013/5966/P – (Granted subjection to s106 Agreement - 03/12/2013) *Erection of single storey rear extension at ground floor level, two dormer roof extensions and inset terrace at roof level and new entrance door on side elevation at ground floor level to create 2 x self contained flats to ground floor and roof space (Class C3).*
- 2012/6195/P – (Appeal Dismissed [Non Determination]) *Erection of single storey rear extension, roof extension, and new entrance door on side elevation at ground floor level to create additional 2 x self-contained flats (class C3).*
  - This determination was based upon the harm caused by the lack of a legal agreement to ensure car free / capped development.
- 9005416 – (Granted - 05/06/1991) *Formation of vehicular hardstanding and means of access to the highway within existing front garden*
- TP66809/9475 – (Granted - 15/10/1952) *The conversion of No. 80, Greencroft Gardens, Hampstead, into four self-contained flats.*

## 5. Relevant policies and guidance

5.1. The relevant policies that would apply to this proposal are taken from the London Borough of Camden Local Development Framework (Core Strategy and Development Policy documents) as adopted on 8<sup>th</sup> November 2010, The London Plan 2015 Consolidated with Alterations (2011) and the NPPF (2012). The following policies will be taken into consideration:

- **National Planning Policy Framework (2012)**
- **London Plan (2015) Consolidated with Alterations Since 2011**
- **Local Development Framework**
- **Core Strategy (2011)**
  - CS5 – Managing the impact of growth and development
  - CS6 – Providing quality homes
  - CS14 – Promoting high quality places and conserving our heritage
- **Development Policies (2011)**
  - DP2 – Making full use of Camden’s capacity for housing
  - DP16 – The transport implications of development
  - DP17 – Walking, cycling and public transport
  - DP18 – Parking standards and limiting the availability of car parking
  - DP19 – Managing the impact of parking
  - DP24 – Securing high quality design
  - DP25 – Conserving Camden's heritage
  - DP26 – Managing the impact of development on occupiers and neighbours
  - DP27 – Basements and lightwells
- **Supplementary Guidance**
  - CPG 1 – Design
  - CPG 2 – Housing
  - CPG 4 – Basements and lightwells
  - CPG 6 – Amenity
  - CPG 7 – Transport
  - CPG 8 – Planning Obligations

## 6. Assessment

6.1. It should be noted that of the external alterations proposed outlined in section 2.1, a number have already been approved via planning application 2013/5966/P. These include a ground floor single storey rear extension with the depth of 5m and a loft extension as is hereby shown in submitted drawings. As a site visit was not completed as part of the pre-application, the extent of the implementation of this permission has not been confirmed.

6.2. The main issues to consider in this case are as follows:

- Residential mix;
- Standard of accommodation;
- Amenity;
- Design;
- Principle of basement development;

- Transport;
- Planning Obligations.

## Residential Mix

- 6.3. Policy DP5 states that the Council will contribute to the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. It refers to the priorities as set out in the Dwelling Size Priorities Table which identifies 2-bed units as a 'very high' priority with the overall aim of the policy seeking a minimum of 40% 2-bed units across any development. In this regard, the provision of 2 out of the 7 units proposed to be 2-bed (29%) is below the stated aim. The remainder of the converted flats are proposed to be three 3-bed 6 person units and two 1-bed 2 person units.
- 6.4. Despite the provision of less than 40% 2-bed units, it is considered that the provision of 3-bed units would be favourable as an alternative by officers as they are identified as having a 'medium' priority within policy DP5. Housing is considered the priority of Camden's Local Development Framework and, as such, the provision of housing is welcomed. Within the scheme a broad mix of sizes are proposed which would be conducive to the wider aims of policy DP5 and as such it is considered that the residential mix proposed would be acceptable on balance.

## Standard of Accommodation

- 6.5. Policy DP26 requires that developments provide an acceptable standard of accommodation in terms of internal arrangements, dwelling and room sizes and amenity space. Developments are also required to provide facilities for waste storage, bicycle storage and outdoor amenity space.
- 6.6. Minimum space standards for new development, as set out within table 1 of the Technical Housing Standards – Nationally Described Space Standard (2015) document requires that the minimum gross internal floor area (GIA) and storage areas for all new dwellings are in accordance with the national standards.
- 6.7. Page 7 of the submitted Design & Access Statement sets out the sizes of each respective unit. Each existing and proposed unit is compared against the Technical Housing standards below for clarity and ease of reference:

Unit	Unit Type	Proposed Size (sqm)	Technical Housing Standards* (sqm)	Storage Proposed (sqm)	Storage Required* (sqm)
1- (Grd + Basement )	3 bed 6p.	188	95	6.1	2.5
2- (Grd + Basement )	3 bed 6p.	174	95	5.7	2.5
3- (1 <sup>st</sup> Floor)	1 bed 2p.	53	50	3.5	1.5
4- (1 <sup>st</sup> Floor)	2 bed 3p.	73	61	3.3	2
5- (2 <sup>nd</sup> Floor)	1 bed 2p.	47	50	3.1	1.5
6- (2 <sup>nd</sup> Floor)	2 bed 3p.	66	61	3.3	2
7- (Loft)	3 bed 6p.	104	95	3.8	2.5

\*DCLG March 2015

- 6.8. As the table above indicates, all but one (no.5) of the units exceed the minimum space standards. Despite the shortfall of 3sqm GIA for this unit, it is considered that (subject to the points outlined in the following paragraphs) this unit would retain a satisfactory standard of accommodation for future occupiers due to its layout and otherwise adequate provision. The minor shortfall in one unit is thus not considered alter the overall acceptability of the standard of accommodation proposed.
- 6.9. Another requirement of policy DP26 is that all new development features an acceptable level of natural light into all habitable rooms. The proposed scheme features 2 units which would be single aspect and North facing as well as habitable rooms at subterranean level and so it will be necessary to demonstrate that level of natural light into these units are sufficient.
- 6.10. While the London Plan Supplementary Planning Guidance Document – Housing (2016) states that single aspect, North facing units should normally be avoided (para.2.3.37); it continues to state that provided that the design of these units are sensitive, adequate light and ventilation may still be possible. It is considered that due to their wide frontage, level of fenestration and shallow depth, the North facing units at first and second floor may be acceptable however this would need to be demonstrated via a daylight/sunlight report. It may also be worth considering high level, obscured windows along the side elevations at first and second floors in order to increase the level of light that these units receive. Provided that these were sensitive designed it is not considered that they would cause material harm to the appearance of the property due to their positioning.
- 6.11. To assess whether acceptable levels of daylight and sunlight are available within proposed habitable spaces, the Council will take into account the standards recommended in the British Research Establishment's Site Layout Planning for Daylight and Sunlight– A Guide to Good Practice (1991). It is therefore recommended that a report is commissioned and submitted alongside any formal submission which is in accordance with these standards.
- 6.12. Units 1 and 2 both feature habitable rooms at subterranean level. It is acknowledged that because of their large size, multiple aspect and the effect of the proposed lightwells that these units may benefit from an acceptable level of natural light however again, this will need to be demonstrated in a submitted report.
- 6.13. In terms of access to outdoor amenity areas, 4 out of 7 units benefit from private spaces in the form of sunken gardens for units 1 and 2 and rear facing terraces for units 1, 2, 3 and 7. Units 4, 5 and 6 do not benefit from any external area however it is considered that given the generous size of the rear garden there would be scope for a communal area which would provide for these units. Details of how the full site would be allocated should be provided with any formal submission.
- 6.14. Details of the cycle parking have not been provided however it is considered that there is adequate area within the curtilage of the site to adequately deliver this provision. It should be noted that this information would need to be provided for any formal submission and that is expected to be in accordance with table 6.3 of the London Plan (2015). In total 12 cycle space would need to be provided to meet this standard.
- 6.15. It should also be noted that refuse storage facilities would need to be suitability provided in order for the overall scheme to be found acceptable in a subsequent application.
- 6.16. Overall it is considered that the standard of accommodation proposed would be adequate to meet policy criteria and be found acceptable by officers. This would however be subject to the submission of a daylight/sunlight report to demonstrate that all habitable rooms would benefit from adequate level of light.

## Residential Amenity

- 6.17. Policy DP26 seeks to protect the quality of life of occupiers and neighbours by only granting permission for development that does not cause harm to amenity. Factors to consider, and which is particularly relevant to this case, include sunlight, daylight, artificial light levels, and visual privacy and overlooking.
- 6.18. As aforementioned the single storey rear extension and roof extensions have already been approved and therefore considered to have an acceptable impact upon the amenities of neighbouring residents. Some concern is retained in relation to the potential for the newly proposed rear terrace at first floor level to exacerbate overlooking and privacy issues for neighbouring sites. As raised rear terraces are common in the local area it is considered that a similar relationship may have already been established with neighbouring properties. A full consideration of this issue would however require onsite analysis. It is considered that the extent of the basement excavation will not cause an adverse impact on the amenities of both the neighbours or occupiers of the proposed units.
- 6.19. It is my considered opinion that the proposed scheme is unlikely to present any substantial harm to the amenities of any neighbouring resident. This would of course be subject to onsite analysis during any subsequent planning application.

## Principle of basement development

- 6.20. Policy DP27 (Basements and lightwells) states that *“in determining the proposals for basement and other underground development, the Council will require an assessment of the scheme’s impact on drainage, flooding, groundwater conditions and structural stability, where appropriate”*. Further guidance on the processes and recommendations for Basement Impact Assessments is set out within CPG4 (Basements and Lightwells, September 2013) and the associated Camden geological, hydrogeological and hydrological study 2010 (referred to below as the ‘Arup report’).
- 6.21. As such, any planning application for a basement development on this site would need to include a Basement Impact Assessment (BIA) which has been prepared in accordance with the processes and procedures as set out within CPG4 (2015).
- 6.22. This site is subject to an underground development constraint (lost rivers). As a result, the submitted BIA will be independently assessed by a third party, at the applicant expense, to satisfy the Council and neighbouring groups that the development would not lead to any unacceptable impacts on the groundwater flows, land stability and surface flows of the area should the development be granted.
- 6.23. For completeness please ensure that the report details the author’s own professional qualifications. Note that CPG4 requires the following qualifications for the different elements of a BIA study or review:

### Surface flow and flooding

A Hydrologist or a Civil Engineer specialising in flood risk management and surface water drainage, with either:

- The “CEng” (Chartered Engineer) qualification from the Engineering Council; or a Member of the Institution of Civil Engineers (“MICE); or

- The “C.WEM” (Chartered Water and Environmental Manager) qualification from the Chartered Institution of Water and Environmental Management.

Subterranean (groundwater) flow

A Hydrogeologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.

Land stability

A Civil Engineer with the “CEng” (Chartered Engineer) qualification from the Engineering Council and specialising in ground engineering; or

A Member of the Institution of Civil Engineers (“MICE”) and a Geotechnical Specialist as defined by the Site Investigation Steering Group with demonstrable evidence that the assessments have been made by them in conjunction with an Engineering Geologist with the “CGeol” (Chartered Geologist) qualification from the Geological Society of London.

## Design

- 6.24. Policy DP24 (Securing high quality design) requires that all developments, including alterations and extensions to existing buildings (in this case, structures) will be expected to consider:
- a) The character, setting, context and the form and scale of neighbouring buildings;
  - b) The character and proportions of the existing building (structure), where alterations and extensions are proposed.
- 6.25. As aforementioned the single storey rear and loft extensions have previously been found acceptable by planning application 2013/5966/P and so no objection is raised in relation to these elements.
- 6.26. Alterations are proposed both to the front and rear of the building as a result of the basement excavation. The extent and design of the lightwells to the front are considered to acceptability relate to the front façade, however specific detailing (i.e. lightwell grilles / railings) have not be forthcoming. You should be advised that these features must be designed to be as discreet as possible and it is unlikely that railings would be considered acceptable given the prevailing character of Greencroft Gardens. The acceptability of lightwells is very much dependant on whether they are in keeping with the prevailing character in the local area..
- 6.27. With regards to the rear sunken gardens, although these features would be sizeable, due to their positioning and the considerable area of retained rear garden, it is not considered that the relationship between the rear garden and the building will be compromised. Again details of the enclosure of these elements have not been provided and you are advised to give careful consideration to the design of this boundary in order to minimise visual disruption.
- 6.28. Further external alterations proposed include the addition of rear terraces at ground and first floor levels as well as the enlargement two of side windows. No objection is raised in relation to the rear terraces in design terms subject to detailed design of the proposed balustrade. You are advised that wrought iron railings are generally preferable to glazing

although this is also subject to detail. The content of paragraph 6.17 will be particularly pertinent to the acceptability of these elements, particularly at first floor level.

- 6.29. Similarly the replacement sash windows are not objectionable subject to appropriate material choice as well as an assessment of any impacts upon the privacy of the neighbouring property.

## **Transport**

- 6.30. Policy DP18 seeks to ensure that developments provide the minimum necessary car parking provision. The Council will, however, expect development to be car free in areas of high accessibility. Paragraph 5.9 of CPG7 defines highly accessible areas as those that have a PTAL rating of 4 and above. As identified above, the application site has a PTAL rating of 6a thereby requiring that this development must be car free. There are no car parking spaces identified on the submitted plans, however it is recognised that some off-street car parking is already provided on site with the front garden currently being used for parking. Nevertheless all new units proposed within the site would be expected to be car-free.
- 6.31. Appendix 2 of the Camden Development Policies document sets out the parking standards that should be adhered to throughout the borough. With regards to cycle parking, a provision of one cycle space per unit is required which, in this case, amounts to twelve spaces as aforementioned.

## **Planning Obligations**

- 6.32. The use of planning obligations is an important tool in managing the impacts of development and assisting the delivery of necessary infrastructure to support the London Plan and Camden's Local Plan documents. They will be used to ensure that the strategic objectives of the Core Strategy and Development Policies are met through requirements attached to individual development proposals.
- 6.33. As a result of the proposed basement excavation, a Construction Management Plan, as a well as highways and streetworks contribution, will be required as part of a Section 106 Legal Agreement. The highways contribution can be refunded provided that, as a result of the works, the adjacent highway is left in a good state of repair.

## **7. Conclusions**

- 7.1. On balance it is my consideration that the proposed extension and sub-division of the property may be found acceptable, subject to addressing the issues relating to sunlight/daylight and detailed design..
- 7.2. A Daylight/Sunlight report will be required to demonstrate that the proposed units receive an appropriate amount of daylight and sunlight. A Basement Impact Assessment will be required to demonstrate that the basement will not cause harm to the built and natural environment.
- 7.3. The acceptability of the proposed first floor rear terrace will also require on site analysis and if it were found that significant harm were to be caused it may need to be removed. Furthermore it is recommended that some of the rear garden is allocated for communal use



in order to ensure that all proposed units benefit from outdoor amenity space. Details of this subdivision would need to be agreed at the application stage.

## 8. Planning application information

8.1. In order to ensure your application is valid, the following information will be required to support the planning application:

- Completed and signed planning application forms for Full Planning Permission;
- An Ordnance Survey based location plan at 1:1250 scale denoting the application site in red;
- Floor plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Roof plans at a scale of 1:50 labelled 'existing' and 'proposed';
- Elevation drawings at a scale of 1:50 labelled 'existing' and 'proposed';
- Section drawings at a scale of 1:50 labelled 'existing' and 'proposed';
  - (Please ensure that all drawings include a scale bar)
- Design and Access Statement;
- The appropriate fee;
- Basement Impact Assessment;
- Daylight/Sunlight Report;
- Please see [supporting information for planning applications](#) for more information.

8.2. We are legally required to consult on applications with individuals who may be affected by the proposals. We would notify neighbours by putting up a notice on each of the proposed sites. The Council must allow 21 days from the consultation start date for responses to be received.

8.3. This application will be decided under delegated powers. However, if 3 or more objections are received, and/or a local amenity group object, then the application will be referred to Member's Briefing which is held every Monday.

**This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.**

Thank you for using Camden's pre-application advice service.

Yours sincerely,

John Diver

Planning Officer  
Planning Solutions Team